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### REMARKS

Claims 1-28 and 30- 34 were pending in the application. Applicants appreciate the indication that Claims 24-28 and 30-33 currently stand allowed. Claims 1, 9-16, 22-23 and 27 have been amended, and Claims 5, 7-8 and 34 have been cancelled, leaving Claims 1-4, 6, 9-28, and 30-33 for further consideration in the present amendment. No new matter has been introduced by these amendments. For example, support for the amendment to Claim 1 and 23 can be found. The amendments to Claim 9-16, 22, and 27 were made to correct format errors noted therein and to better define the claims. With regard to the addition of the term "water" in Claims 1 and 23, those of ordinary skill in the art will readily recognize that the term aqueous composition must include water as one of its substituents.

Reconsideration and allowance of the claims is respectfully requested in view of the above amendments and the following remarks.

#### Claim Rejections Under 35 U.S.C. § 112, Second Paragraph

A. Claims 1-8, 17-23, and 34 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants respectfully traverse.

The rejection applied to Claims 1-8, 17-23, and 34 has been rendered moot in view of the amendments to the respective independent claims. In view of the foregoing, Applicants request that the rejection be withdrawn.

B. The rejection of Claims 5, 7, and 8 under 35 U.S.C. § 112, second paragraph, has been rendered moot in view of the cancellation thereof.

#### Claim Rejections Under 35 U.S.C. § 102(b)

A. Claims 1-4, 6-8, 17-19, and 23 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 5,817,182 to O'Brien. Applicants respectfully traverse.

O'Brien is generally directed to an etching process for removing the manufacture of semiconductor devices. The etching process includes exposing a thermal oxide surface with buffered

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and unbuffered HF solutions.

To anticipate a claim, a reference must disclose each and every element of the claim. *Lewmar Marine v. Varient Inc.*, 3 U.S.P.Q.2d 1766 (Fed. Cir. 1987).

O'Brien fails to disclose removing an oxidation product from a substrate by contacting the substrate with an aqueous composition *consisting essentially* of an acid having the formula  $H_xAF_6$ , wherein A is selected from the group consisting of Si, Ge, Ti, and Ga; and x is 1-6. In O'Brien, the solution applied to the thermal oxide surface is a buffered or an unbuffered HF solution. As noted by Examiner Carillo in the previous Office Action, an  $H_2SiF_6$  byproduct of the initial reaction between HF and  $SiO_2$  is formed. However, this is in addition to HF. Thus, the solution applied to the substrate does not *consist essentially* of an acid having the formula  $H_xAF_6$  as claimed by Applicants.

Accordingly, the rejection applied to Claims 1-4, 6-8, 17-19, and 23 is requested to be withdrawn.

B. Claims 1, 2, 5, 6, 17, 23, and 34 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by US Patent No. 6,274,027 to Kiya. Applicants respectfully traverse.

Kiya is generally directed to a process for descaling titanium materials having an oxide scale. The process comprises multiple steps including an electrolysis step to remove a portion of the oxide scale followed by an acid pickling step to remove any remaining oxide scale or an oxide film that may have been formed during electrolysis. The acid pickling step is disclosed as being applied to remove oxide scale remaining after, or an oxide film formed during, an electrolysis treatment. Kiya is very particular as to the type of oxide removed by its acid pickling step. The main component of oxide scale is characterized as a rutile type  $TiO_2$  and the main component of the oxide film is characterized as anatase  $TiO_2$ .

Kiya fails to disclose removing an oxidation product from a substrate, wherein the substrate is a turbine component formed of an alloy comprising nickel, chromium, aluminum, or at least one of the foregoing metals, or a polymer. Withdrawal of the rejection is hereby requested for at least this reason.

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Claim Rejection Under 35 U.S.C. § 103(a)

Claims 3, 4, and 18-21 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Kiya in view of US Patent No. 5,769,967 to Dolan. Applicants respectfully traverse this rejection.

Kiya is discussed above

Dolan is generally directed to process for forming a corrosion protective coating.

For an obviousness rejection to be proper, the Examiner must meet the burden of establishing a *prima facie* case of obviousness, i.e., that all elements of the invention are disclosed in the prior art; and that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); *Amgen v. Chugai Pharmaceuticals Co.*, 927 U.S.P.Q.2d, 1016, 1023 (Fed. Cir. 1996).

The cited references, individually or in combination, fail to establish a *prima facie* case of obviousness because the references fail to teach or suggest A method for removing at least one of: (1) an oxidized product of a substrate from a surface of the substrate, wherein the substrate is a turbine component formed of an alloy comprising nickel, chromium, aluminum, or at least one of the foregoing metals, or a polymer, or (2) an oxidized product of a metallic coating disposed on the substrate from a surface of the metallic coating. Kiya is directed to titanium metal substrates. There is no disclosure of the substrate as claimed by Applicants. Dolan fails to compensate for the deficiencies of Kiya.

In view of the foregoing, the rejection applied to Claims 3, 4, and 18-21 is requested to be withdrawn.


It is believed that the foregoing amendments and remarks fully comply with the Office Action and that the claims herein should now be allowable to Applicants. Accordingly, reconsideration and allowance is requested.

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If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 06-1130 maintained by Applicant's attorneys.

Respectfully submitted,

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